

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Jonathan Leite,

Plaintiff

v.

Corrections Officers Matthew Goulet,
Elmer Van Hoesen, Michael Beaton, Lynn McLain,*
Heather Marquis, Trevor Dube, Rhianne Snyder,*
Eddy L'Heureux, Jeffrey Smith, Dwane Sweatt,
Yair Balderrama, Bob Morin, Ejike Esobe, and
Kathy Bergeron

Defendants

Case No. 1:15-cv-00280-PB

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**DEFENDANT EJIKE ESOBE'S RESPONSES
TO FIRST SET OF INTERROGATORIES**

Defendant Ejike Esobe hereby responds as follows to the first set of interrogatories propounded upon him in this matter by plaintiff Jonathan Leite.

1. Please fully describe your employment history since graduation from high school, identifying for each employer the name and address of the employer, your dates of employment with the employer, the title of each position that you held with the employer (stating the dates you held the position), the name and address and job title of each supervisor to whom you reported (stating the dates you reported to the supervisor), and your rates of pay for all dates of employment with the employer.

The defendant objects to this interrogatory as irrelevant and disproportional insofar as it requests information as to: the defendant's employment history prior to employment by the New Hampshire Department of Corrections; the address of any of the defendant's supervisors at any time; or the defendant's rate of pay at any time. Subject to and without waiver of these objections, the defendant states: I began working for the New Hampshire Department of Corrections ("DOC") as a corrections officer at the Northern New Hampshire Correctional Facility in approximately March 2012. I resigned from that position in approximately February 2013. I reported to various supervisors over that

7. Please fully describe the events involving NNHCF personnel with regard to discovering Mr. Leite after the August 24, 2012, assault that he suffered and getting him medical treatment, identifying the employee(s) who discovered Mr. Leite, the time at which Mr. Leite was discovered, and each action that NNHCF personnel took with respect to getting Mr. Leite medical attention, identifying for each such action the substance of each action performed, the person(s) performing the action, and when the action was performed.

I was not involved in any of these actions, and I have no recollection of them.

8. Did you participate in any investigation of the August 24, 2012, incident causing Mr. Leite's injury? If your answer is anything other than an unqualified no, please state and/or identify who conducted the investigation, what you did in connection with the investigation, what the investigation found, and all communications in which you participated relating in any way to the investigation, identifying the date of the communication, the place of the communication, the form of the communication (whether written or oral), the persons present for the communication (stating each such person's name, address, dates of employment with the State of New Hampshire, and job title for all dates of employment), the substance of the communication (identifying who stated what), and all documents relating to and/or evidencing the communication.

The defendant objects to this interrogatory as irrelevant and disproportional insofar as it requests the identification of "all communications in which [the defendants] participated relating in any way to the investigation" and the "dates of employment . . . and job title for all dates of employment" of each person present for each such communication. Subject to and without waiver of this objection, the defendant states: No.

9. Have you received any discipline or counseling in connection with your employment at NNHCF within the past five (5) years? If so, for each such instance of discipline and/or counseling, please state and/or identify the substance of the discipline and/or counseling, the date you received the discipline and/or counseling, who administered the discipline and/or counseling to you, all documents relating to and/or evidencing the discipline and/or counseling, and all communications in which you participated relating to the discipline and/or counseling, identifying the date of the communication, the place of the communication, the form of the communication (whether written or oral), the persons present for the communication (stating each such person's name, address, dates of employment at NNHCF, and job title for all dates of employment), the substance of the communication (identifying who stated what), and all documents relating to and/or evidencing the communication.

The defendant objects to this interrogatory as irrelevant and disproportional. The defendant further objects to this interrogatory as calling for the production of information that potentially threatens undue interference with the defendant's personal privacy.